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March 7, 2007

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Notice of Written Ex Parte Presentation – CC Docket No. 96-115; RM 11277*

Dear Ms. Dortch:

This letter is to advise you that on behalf of Verizon Wireless, I had a telephone conversation with Michelle Carey, Senior Legal Advisor to Chairman Kevin J. Martin, to discuss the reasons why a 30-day period for implementing new regulations governing the treatment of customer proprietary network information ("CPNI") would be unreasonable.

Verizon Wireless employs approximately 30,000 customer service and sales representatives that would need to be trained in the event of a change in the Commission's CPNI rules. For instance, if the Commission adopts a rule requiring customers to provide a password before a carrier can release call detail information over the telephone, Verizon Wireless would have to develop training content, draft "methods and procedures" documents, determine the appropriate type of training, develop targeted training depending on employees' job functions, and then schedule and conduct training for thousands of employees. Verizon Wireless estimates that it would take up to 6 months to complete this type of training. Similarly, if the Commission were to require carriers to provide notice to customers each time a password is established or changed on a customer's account, there would be related IT development work necessary, which could also take considerably more than 30 days.

Consistent with the Commission's rules on *ex parte* communications, please

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associate this letter, which is being filed electronically, in the captioned docket. Please let me know if there are any questions related to this filing.

Very truly yours,

A handwritten signature in black ink, appearing to read "Charon Phillips". The signature is written in a cursive, flowing style with a large initial "C".

Charon Phillips

cc: M. Carey